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Counsel for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MedWell LLC, a limited liability company)) Plaintiff,)) v.)) CIGNA Corporation; CIGNA Health and) Life Insurance Company; CIGNA Healthcare) of New Jersey, Inc.; Connecticut General) Life Insurance Company; John Does and) Jane Does 1-20; and XYZ Corporations and) ABC Partnerships 1-20,)) Defendants.))	Case No. 2:20-cv-10627-KM-ESK *Document Filed Electronically*

SECOND DECLARATION OF STEVEN L. PENARO

1.   My name is Steven L Penaro. I am over eighteen (18) years of age, under no legal

disability, and competent in all ways to give this declaration. I have the personal knowledge required

to execute this declaration and can confirm the accuracy of the information set forth herein. If sworn

as a witness, I could competently testify to the facts contained herein.

2.   I am an attorney with the law firm of Alston & Bird LLP. I represent Defendants Cigna

Corporation, Cigna Health and Life Insurance Company, Cigna Healthcare of New Jersey, Inc., and

Connecticut General Life Insurance Company (collectively, "Cigna") in the above-captioned action.

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3.   I submit this declaration in support of Cigna's Surreply in Opposition to Plaintiff's Motion to Remand.

4.   Attached hereto as Exhibit A is a true and accurate copy of select pages of the Venus Laboratories, Inc. Open Access Plus Medical Benefits Summary Plan Description dated January 1, 2018, that I obtained from Cigna. Exhibit A is being FILED UNDER SEAL.

5.   Attached hereto as Exhibit B is a true and accurate copy of select pages of the Harris Corporation Comprehensive Medical Benefits Summary Plan Description dated January 1, 2017, that I obtained from Cigna. Exhibit B is being FILED UNDER SEAL.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 2, 2020.

/s/ Steven L. Penaro
Steven L. Penaro